

that the multilayer film is configured to transmit light of the first polarized light at a first incidence angle, and reflect light of the second polarized light component at the first incidence angle. The claim further recites that the dielectric multilayer film *transmits* light of the second polarized light component at a second incidence angle "different from the first incidence angle." In other words, the light of the second polarized light component is either reflected or transmitted by the dielectric multilayer film, in dependence upon the angle of incidence.

The Office Action contends that this claimed subject matter is met by the polarizer film 302 of the Budd patent, with particular reference to column 4, lines 53-67 and column 5, lines 1-17. It is respectfully submitted, however, that the Budd patent does not disclose that the polarizer film exhibits the incident angle dependency recited in the claim. Rather, at column 4, lines 57-58, the reference states that the material of the polarizer film "has the property of reflecting one polarization while transmitting the other." It does not disclose, nor otherwise suggest, that this film reflects one of the polarizations at a particular incidence angle, and transmits the *same* polarization at a different incidence angle. For example, as depicted in Figure 3A, the polarizer film 302 transmits s-polarized light (represented by the circular symbol) and reflects p-polarized light (represented by the double arrow).

Another element of the polarization conversion optical system recited in claim 1 is a reflecting element configured such that light transmitted through the dielectric multilayer film at the first incidence angle is reflected so as to impinge the dielectric multilayer film at the second incidence angle. In rejecting the claim, the Office Action asserts that this claimed subject matter is met by the reflecting element 402

illustrated in Figure 4A of the Budd patent. It is respectfully submitted, however, that the patent does not disclose the relative incidence angles recited in the claim.

Specifically, it does not disclose that the flat mirror 402 reflects light passing through the polarizer film 302 at a first incidence angle (namely the angle at which one of the polarized components is reflected by the polarizer film 302) and reflects it back to the film at a second angle, at which the same component is transmitted by the film. At best, the Budd patent only discloses normal incidence (see column 5, line 3). It does not disclose the type of relationship between the polarizer film 302 and the flat mirror 402 that is recited in claim 1, wherein the reflecting element changes the angle of incidence from one at which a polarized component is reflected by the film to one at which that same component is transmitted by the film.

For at least these reasons, therefore, it is respectfully submitted that the Budd patent does not suggest the subject matter of claim 1 that is alleged in the Office Action. Furthermore, the foregoing differences between the claimed subject matter and the disclosure of the Budd patent are not rendered obvious by either of the Wentz or Fukushima references. Although the Wentz patent discloses a dielectric polarizer for high average and high peak power operation, it does not disclose, nor even suggest, a dielectric multilayer film having a different incident angle dependency relative to a first polarized light component and a second polarized light component having mutually intersecting planes of polarization. Even more remotely, the Fukushima reference does not disclose, nor suggest, polarization conversion.

Consequently, even if the teachings of the Budd, Wentz and Fukushima references could be combined, the result would not lead a person of ordinary skill in the art to the subject matter recited in claim 1. If the rejection of the claim is not

withdrawn, the examiner is requested to explain how the Budd reference is being interpreted to teach the distinguishing features identified above, in view of its lack of disclosure of such features.


For reasons similar to those set forth above, independent claims 6 and 10 are likewise not suggested by the teachings of these references. Furthermore, all of the dependent claims are allowable over these references, at least by virtue of the patentable distinctions noted above.

Reconsideration and withdrawal of the rejections, and allowance of all pending claims are respectfully requested.

Respectfully submitted,

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